

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

EMOJI COMPANY GmbH,

Plaintiff,

v.

A111111111 et al.,

Defendants.

Case No.: 20-cv-5670

Judge Virginia M. Kendall

**PRELIMINARY INJUNCTION ORDER**

THIS CAUSE being before the Court on EMOJI COMPANY GmbH's Motion for a Preliminary Injunction, and this Court having considered the evidence before it hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction in its entirety against the Defendants identified in Schedule A attached hereto (collectively, the "Defendants").

THIS COURT HEREBY FINDS that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants are reaching out to do business with Illinois residents by operating one or more commercial, interactive Internet Stores through which Illinois residents can purchase products bearing infringing and/or counterfeit versions of Plaintiff's EMOJI Trademarks (the "EMOJI Products").

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("TRO") should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiff's

previously granted Motion for a Temporary Restraining Order establishes that Plaintiff has a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted.

Specifically, Plaintiff has made a *prima facie* showing of trademark infringement because (1) the EMOJI Trademarks are distinctive marks and registered with the U.S. Patent and Trademark Office on the Principal Register as U.S. Trademark Registration Nos. 4,868,832; 5,202,078 and 5,415,510 for the EMOJI marks, (2) Defendants are not licensed or authorized to use EMOJI Trademarks, and (3) Defendants' use of the EMOJI Trademarks are causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with EMOJI COMPANY GmbH. Furthermore, Defendants' continued and unauthorized use of the EMOJI Trademarks irreparably harms Plaintiff through diminished goodwill and brand confidence, damage to Plaintiff's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Plaintiff has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions.

Accordingly, this Court orders that:

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be preliminarily enjoined and restrained from:
  - a. using Plaintiff's EMOJI Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any

product that is not a genuine EMOJI Product or is not authorized by Plaintiff to be sold in connection with Plaintiff's EMOJI Trademarks;

- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine EMOJI Product or other product produced by Plaintiff, that is not Plaintiff's or is not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under Plaintiff's EMOJI Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
- d. further infringing Plaintiff's EMOJI Trademarks and damaging Plaintiff's goodwill;
- e. otherwise competing unfairly with Plaintiff in any manner;
- f. shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear Plaintiff's EMOJI Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof;
- g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the Defendant Domain Names, or

any other domain name or online marketplace account that is being used to sell (now or in the future) Counterfeit EMOJI Products; and

- h. operating and/or hosting websites at the Defendant Domain Names and any other domain names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing Plaintiff's EMOJI Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof that is not a genuine EMOJI Product or is not authorized by Plaintiff to be sold in connection with Plaintiff's EMOJI Trademarks.
- 2. Each Defendant, within fourteen (14) days after receiving notice of this Order, shall serve upon Plaintiff a written report under oath providing: (a) their true name and physical address, (b) all websites and online marketplace accounts on any platform that it owns and/or operate (c) their financial accounts, including all DHgate accounts, and (d) the steps taken by that Defendant to comply with paragraph 1, a through h, above.
- 3. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afiliast Limited, CentralNic, Nominet, and the Public Interest Registry, within Five (5) business days of receipt of this Order or prior to expiration of this Order, whichever date shall occur first, shall, at Plaintiff's choosing:
  - a. unlock and change the registrar of record for the Defendant Domain Names to a registrar of Plaintiff's selection until further ordered by this Court, and the domain name registrars shall take any steps necessary to transfer the Defendant Domain Names to a registrar of Plaintiff's selection until further ordered by this Court; or

- b. disable the Defendant Domain Names and make them inactive and untransferable until further ordered by this Court.
- 4. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as iOffer and DHgate, social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendant Domain Names, and domain name registrars, shall within five (5) business days of receipt of this Order:
  - a. disable and cease providing services for any accounts through which Defendants engage in the sale of counterfeit and infringing goods using the EMOJI Trademarks, including any accounts associated with the Defendants listed in Schedule A;
  - b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the EMOJI Trademarks; and
  - c. take all steps necessary to prevent links to the Defendant Domain Names identified in Schedule A from displaying in search results. This includes, but is not limited to, removing links to the Defendant Domain Names from any search index.
- 5. Defendants and any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of Defendants' websites at the Defendant Domain Names or other websites operated by Defendants, including, without limitation, any online marketplace platforms such as iOffer and DHgate, advertisers, Facebook, Internet Service Providers ("ISP"), web hosts, back-end service providers, web

designers, sponsored search engine or ad-word providers, banks, merchant account providers, including DHgate, third party processors and other payment processing service providers, shippers, and domain name registrars (collectively, the "Third Party Providers") shall, within five (5) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

- a. The identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information;
- b. The nature of Defendants' operations and all associated sales and financial information, including, without limitation, identifying information associated with the Online Marketplace Accounts, the Defendant Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplace Accounts and Defendant Domain Names;
- c. Defendants' websites and/or any Online Marketplace Accounts;
- d. The Defendant Domain Names or any domain name registered by Defendants; and
- e. Any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation,

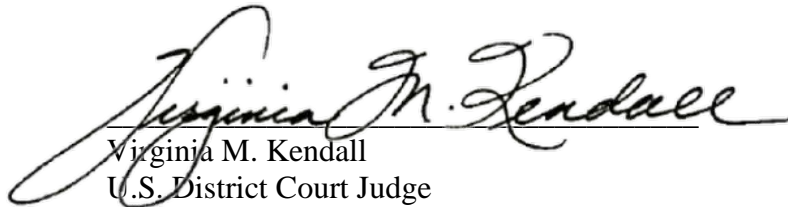
DHgate, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

6. Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
7. DHgate shall, within five (5) business days of receipt of this Order, for any Defendant or any of Defendants' Online Marketplace Accounts or websites:
  - a. Locate all accounts and funds connected to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any DHgate accounts connected to the information listed in Schedule A hereto; and
  - b. Restrain and enjoin any such accounts or funds that are China or Hong Kong-based from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
8. Plaintiff may provide notice of these proceedings to Defendants, including notice of any future hearings and service of process pursuant to Fed.R.Civ.P. 4(f)(3), by electronically publishing a link to the Complaint, this Order and other relevant documents on a website to which the Defendant Domain Names are transferred to Plaintiff's control will redirect, or by sending an e-mail to the e-mail addresses identified in Schedule A hereto; and any e-mail addresses provided for Defendants by third parties accompanied by a link to the website where the above-identified documents are located. The Clerk of Court is directed to issue a single original summons in the name of "A111111111 and all other Defendants identified in Schedule A to the Complaint" that shall apply to all Defendants. The combination of providing notice via electronic publication or e-mail, along with any

notice that Defendants receive from domain name registrars and payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.

9. Plaintiff's Schedule A to the Complaint and the TRO is unsealed.
10. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order on two days' notice to Plaintiff or on shorter notice as set by this Court.
11. Plaintiff shall post a bond with the Court within one week of entry of this Order.

Dated: October 28, 2020



Virginia M. Kendall  
U.S. District Court Judge



**SCHEDULE A**

<b>No.</b>	<b>Defendant Name / Alias</b>
1	A111111111
2	aape_store01
3	abner799
4	achongwudi
5	afshor
6	alicechen1109
7	annewallace
8	aokaishen
9	atopstore
10	aucostco
11	aunistyle
12	Babieskids
13	baby_gift
14	ball2006
15	bastetjewelry
16	beajewelry
17	beasy110
18	bella666
19	best_fashions
20	bestsupplier666
21	Billshuiping
22	blingjewelrymall
23	blueorange
24	bmwmini
25	bola898
26	Bosegongsi
27	brooch001
28	buyer2016
29	cactus77
30	Caiden20
31	Cangshou
32	Category
33	Cathy_jewelry
34	chengzhisuda
35	eleng
36	gift_wholesale
37	giftsale
38	hiramee

39	lidazhi88
40	milunjewelry
41	pineyin
42	shuiyan168
43	wdshop
44	younes
45	cooolman
46	online24hours
47	online24wholesale
48	big_fashion
49	cars_accessories
50	a531205967
51	abc_baby
52	alovebaby
53	amy002
54	amy360
55	andyt168
56	andyt186
57	andyt188
58	Andyt189
59	angela918
60	appletree_
61	army
62	atunice
63	auto2011
64	avonqq
65	b2b86b2c
66	baby_no1
67	babylovely94
68	beats_solo3
69	beautykid
70	beilejia20170704
71	best_suppiler
72	bigmango
73	bking
74	bofjoy
75	buildourdream
76	ccyumi
77	factorystore2016
78	hermane
79	suning

80	tass
81	Windyai
82	Aesto
83	alane_ling
84	alicemummy
85	Aliexpress
86	aliyan1109
87	along777
88	andytt
89	anglebabys
90	asenart
91	atuomoto
92	ayintian
93	babypro
94	baixiangguo
95	bakinggirl
96	bbzzz
97	beijia2013
98	beijingfuji02
99	bestness
100	boutiquewig01
101	bqintian
102	cakestencil
103	Cansou
104	carrierr
105	cest
106	cova_fashion
107	dwtrade
108	E_shop2008
109	Helenchan89
110	hopestar168
111	lilykang
112	Sd002
113	star_baby
114	topteam
115	acam
116	anastasian
117	andyt88
118	Anjuen
119	anna3000
120	aya134

121	babymum
122	baiyulanflo
123	bertoutdoor
124	Beutytomorrow2018
125	bonroy_international
126	Brain22
127	buycheapsdhgate
128	caspian
129	Catcatcat1990
130	cfsw
131	champsports
132	partner2018
133	allinbag
134	amoybasketballshoes
135	aozhouqie
136	arrownet
137	b2b_bags
138	bags_fashion
139	bagstime
140	bawanbian
141	Bd001
142	bestname
143	bidashoes
144	bigluk123
145	billchenshuiping
146	bluemoodd
147	bokulu
148	booket
149	carryleft
150	buttee10
151	buttee2
152	buttee4
153	Buttee5
154	Buttee6
155	buttrr10
156	buttrr2
157	buttrr7
158	buttrr9
159	alimy31
160	amandal
161	angels02

162	angels04
163	angels05
164	bapetime
165	aicoo
166	atmt710
167	B2b_sellers
168	Babydog
169	beautylove08
170	Beimei20170708
171	besgo
172	best_bikini
173	Big_home
174	biubiustore
175	Bulangying
176	chairdesk
177	Wobu
178	alag
179	almondor
180	amaryllier
181	armmaxgps
182	aurorl
183	Auto_motorcycle_01
184	Behome
185	Bigdeal1
186	bling_world
187	alex_zeng
188	applebbyy
189	babyxu123
190	bags_good
191	bestfashion07
192	goodfaithgirl
193	shoe80777
194	yigu008
195	Abby17y
196	angela686
197	Artstyle
198	baby_market
199	beauty1688
200	beautyyourhair
201	brandcap
202	abchouse

203	angelina1991
204	ava7228
205	B2b_best_seller
206	besgohouseware
207	card_supplier1
208	cariel
209	ariscostumes
210	beautifulworld888
211	Binleinflatable
212	bossde3
213	Calcetines
214	Cartoonkingdom
215	Ahx618
216	Andycj
217	best_teamwork
218	best2020
219	Bonjournihao2019
220	Buddywin
221	Afantitoy
222	aimama
223	amy053011
224	anzhuhua
225	Applebean2016
226	b2b_baby
227	bestdeal
228	bestdeal2010
229	Bichery
230	boeka
231	bestsmoking
232	cahstore
233	A1048874333
234	a871461251
235	aanywellpatch
236	aishiwell2017
237	Algera
238	all_sport
239	amzbook
240	anddly_top
241	angelbabydhgate
242	anna92
243	Are_beautiful

244	artini
245	auction
246	awonder
247	babala1
248	Bdauto
249	bdhome
250	Beamingltd
251	beautyhome1
252	beddingbaby
253	best_sports
254	bestaccessories
255	Bestory
256	bf_willbebetter
257	bigtree_world
258	bonroy_technology
259	busiorld
260	crazyfairyland
261	imert
262	noosasa

No	Defendants Online Marketplace
1	<a href="https://www.dhgate.com/store/19756077">https://www.dhgate.com/store/19756077</a>
2	<a href="https://www.dhgate.com/store/2151704">https://www.dhgate.com/store/2151704</a>
3	<a href="https://www.dhgate.com/store/19745479">https://www.dhgate.com/store/19745479</a>
4	<a href="https://www.dhgate.com/store/20694080">https://www.dhgate.com/store/20694080</a>
5	<a href="https://www.dhgate.com/store/20962616">https://www.dhgate.com/store/20962616</a>
6	<a href="https://www.dhgate.com/store/21066944">https://www.dhgate.com/store/21066944</a>
7	<a href="https://www.dhgate.com/store/20037436">https://www.dhgate.com/store/20037436</a>
8	<a href="https://www.dhgate.com/store/21103870">https://www.dhgate.com/store/21103870</a>
9	<a href="https://www.dhgate.com/store/20720053">https://www.dhgate.com/store/20720053</a>
10	<a href="https://www.dhgate.com/store/19929791">https://www.dhgate.com/store/19929791</a>
11	<a href="https://www.dhgate.com/store/20773378">https://www.dhgate.com/store/20773378</a>
12	<a href="https://www.dhgate.com/store/20399987">https://www.dhgate.com/store/20399987</a>
13	<a href="https://www.dhgate.com/store/21100701">https://www.dhgate.com/store/21100701</a>
14	<a href="https://www.dhgate.com/store/20029108">https://www.dhgate.com/store/20029108</a>
15	<a href="https://www.dhgate.com/store/20559199">https://www.dhgate.com/store/20559199</a>
16	<a href="https://www.dhgate.com/store/19971764">https://www.dhgate.com/store/19971764</a>
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21	<a href="https://www.dhgate.com/store/19896515">https://www.dhgate.com/store/19896515</a>
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49	<a href="https://www.dhgate.com/store/21014168">https://www.dhgate.com/store/21014168</a>
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51	<a href="https://www.dhgate.com/store/21363584">https://www.dhgate.com/store/21363584</a>
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53	<a href="https://www.dhgate.com/store/20708502">https://www.dhgate.com/store/20708502</a>
54	<a href="https://www.dhgate.com/store/19876557">https://www.dhgate.com/store/19876557</a>
55	<a href="https://www.dhgate.com/store/21059111">https://www.dhgate.com/store/21059111</a>
56	<a href="https://www.dhgate.com/store/21072261">https://www.dhgate.com/store/21072261</a>
57	<a href="https://www.dhgate.com/store/21059106">https://www.dhgate.com/store/21059106</a>
58	<a href="https://www.dhgate.com/store/21059108">https://www.dhgate.com/store/21059108</a>
59	<a href="https://www.dhgate.com/store/angela918">https://www.dhgate.com/store/angela918</a>



60	<a href="https://www.dhgate.com/store/20187746">https://www.dhgate.com/store/20187746</a>
61	<a href="https://www.dhgate.com/store/14497585">https://www.dhgate.com/store/14497585</a>
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69	<a href="https://www.dhgate.com/store/19742440">https://www.dhgate.com/store/19742440</a>
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73	<a href="https://www.dhgate.com/store/20062484">https://www.dhgate.com/store/20062484</a>
74	<a href="https://www.dhgate.com/store/21211847">https://www.dhgate.com/store/21211847</a>
75	<a href="https://www.dhgate.com/store/20487268">https://www.dhgate.com/store/20487268</a>
76	<a href="https://www.dhgate.com/store/20098031">https://www.dhgate.com/store/20098031</a>
77	<a href="https://www.dhgate.com/store/20297925#st-navigation-storehome">https://www.dhgate.com/store/20297925#st-navigation-storehome</a>
78	<a href="https://www.dhgate.com/store/20329350#st-navigation-storehome">https://www.dhgate.com/store/20329350#st-navigation-storehome</a>
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